

Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter Of)	
)	
Section 63.71 Application of)	WC Docket No. _____
)	
PAETEC Communications, LLC)	
)	
For Authority Pursuant to Section 214 of)	
the Communications Act of 1934 to)	
Impair or Discontinue the Provision of Service.)	

SECTION 63.71 APPLICATION OF WINDSTREAM SERVICES, LLC

PAETEC Communications LLC ("PAETEC") an affiliate of Windstream Services, LLC ("Windstream"), through its undersigned counsel and pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. §214, and Section 63.71 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §63.71, hereby files this Application for authority to impair or discontinue Toll-Free service in the manner described below to a limited number of customers pursuant to Section 63.71, with such impairment/discontinuance to occur as part of decommissioning a legacy toll-free services platform and upgrading to a newer technology platform.

. In support of this Application, Windstream submits the following information:

1. Information listed in 47 C.F.R. § 63.71(a)(1)-(4) (47 C.F.R. § 63.71(b)(2)):

a. Name and Address of Carrier (47 C.F.R. § 63.71(a)(1)-(4), (b)(2)):

PAETEC Communications, LLC
4001 North Rodney Parham Rd.
Little Rock, AR 72212

b. Date of Planned Discontinuance (47 C.F.R. § 63.71(a)(2), (b)(2)):

Windstream plans to replace the PAETEC toll-free platform on or about September 1, 2018, with simultaneous turn-up of the new platform.

c. Point of Geographic Areas of Service Affected (47 C.F.R. § 63.71(a)(3), (b)(2)):

The “Affected” Customers” (as described below) are located in the areas of Hyde Park, MA, Hudson, NH, Morristown, NJ, New York, NY and King of Prussia, Norristown and Philadelphia, PA.

d. Brief Description of the Type of Service to be Affected (47 C.F.R. § 63.71(a)(4), (b)(2)):

The service to be affected is Toll-Free service as provided via PAETEC’s legacy Platform (“Affected Service”).to customers who currently utilize an international ring-to-number (“RTN”).

2. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):

On July 11, 2018 Windstream sent by First Class U.S. Mail notices to all Affected Customers of the planned service impairment/discontinuance. A copy of such notice as sent to these customers is attached hereto as Attachment 1, the notice being compliant with, among other things, Section 63.71(a)(5) of the Commission’s rules, 47 C.F.R. § 63.71(a)(5).

3. Regulatory Classification of Carrier (47 C.F.R. § 63.71 (a)(4)):

Windstream is nondominant with respect to the Affected Service.

4. Service:

In accordance with Section 63.71(a)(1) of the Commission's rules, 47 C.F.R. § 63.71(a)(1), Windstream is submitting a copy of this Application by First Class U.S. Mail to the Massachusetts Department of Public Utilities, the New Hampshire Public Utilities Commission, the New Jersey Board of Public Utilities, the New York Public Service Commission, the Pennsylvania Public Utility Commission, the Office of Massachusetts Governor, Charlie Baker, the Office of New Hampshire Governor, Chris Sununu, the Office of New Jersey Governor, Phil Murphy, the Office of New York Governor Andrew Cuomo, the Office of Pennsylvania Governor Tom Wolf and also to the Secretary of Defense (at the address given in 47 C.F.R. § 63.71(a)).

5. Additional Questions Regarding This Application May be Addressed to the Undersigned.

6. Circumstances of Discontinuance.

PAETEC is providing Toll-Free service to customers via an end-of-life platform. A limited number of these customers - 14 in total (1 enterprise customer and 13 small business customers) currently use an international RTN with their service on that legacy platform (the "Affected Customers"), which is scheduled to be decommissioned on or about September 1, 2018. Windstream is replacing the legacy platform with a newer technology Toll-Free service platform which requires customers to use a domestic RTN; thus, the Affected Customers will need to switch to use of a domestic RTN to maintain Toll-Free service from Windstream. The Affected Customers are located across five states in the specific areas of Hyde Park, MA, Hudson, NH, Morristown, NJ, New York, and King of Prussia, Norristown and Philadelphia, PA.

To the extent Affected Customers are willing to switch to a domestic RTN, Windstream will assist the them in migrating their services to Windstream's supported Toll-Free service.

Alternatively, customers will have sufficient time to make arrangements to obtain Toll-Free service from another service provider.

7. Conclusion

Windstream believes that the proposed service impairment is reasonable and necessary. As outlined herein, Windstream will take reasonable steps, to the extent that it is able, to assure that the impairment/discontinuance of this service is not unduly disruptive to the present or future public convenience and necessity. These customers will not be unduly harmed because they are being provided ample notice of the discontinuance, are being offered the alternative of moving their Toll-free service to the supported Windstream platform (subject to use of a domestic RTN), and have the option to move service to an alternative provider.

Accordingly, Windstream respectfully requests that the Commission grant it authority to impair/discontinue Toll-Free service in the manner described herein to the limited number of Affected Customers pursuant to Section 63.71, with such action to occur as part of decommissioning a legacy toll-free services platform and in favor of a newer technology platform.

Respectfully Submitted,

A handwritten signature in black ink that reads "Edward J. Cadieux". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Edward J. Cadieux
Regulatory Counsel
Windstream Services, LLC
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July 11, 2018

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Section 63.71 Application was served this 11th day of July 2018, by mailing true and correct copies thereof, postage prepaid, to the following persons to the addresses listed below.

Secretary of Defense
Attn: Special Assistance for Telecommunications
Pentagon
Washington, DC 20301

Massachusetts Department of Public Utilities
Attn: Mark D. Marini, Secretary
One South Station
Boston, MA 02110

Office of Governor Charles D. Baker
Statehouse, Room 280
Boston, MA 02133

New Hampshire Public Utilities Commission
Attn: Debra A. Howland, Executive Director & Secretary
21 South Fruit Street
Suite 10
Concord, NH 03301

Office of Governor Chris Sununu
Office of the Governor
State House
107 North Main Street
Concord, NH 03301

New Jersey Board of Public Utilities
Attn: Kristi Izzo, Secretary of the Board
44 So. Clinton Avenue
Trenton, NJ 08609

Office of Governor Phil Murphy
PO Box 001
Trenton, NJ 08625

New York Public Service Commission
Attn: Kathleen H. Burgess, Secretary to the Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223-1350

Office of Governor Andrew Cuomo
State Capitol
Albany, NY 12224

Pennsylvania Public Utility Commission
Attn: **Rosemary Chiavetta, Secretary**
400 North Street, Keystone Bldg.
Harrisburg, PA 17120

Office of Governor Tom Wolf
225 Main Capitol Bldg.
Harrisburg, PA 17120

A handwritten signature in dark ink, reading "Edward J. Cadieux". The signature is written in a cursive, flowing style. The first name "Edward" is written in a larger, more prominent script, followed by "J." and "Cadieux". The signature is positioned above a horizontal line.

Edward J. Cadieux

Attachment 1

Customer Notice